

HONORABLE TANA LIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BUNGIE, INC., a Delaware corporation,  
Plaintiff,  
v.  
KUNAL BANSAL, an individual, d/b/a  
LAVICHEATS.COM,  
Defendant.

Case No. 2:21-cv-1111-TL

DECLARATION OF STEVEN GURIS IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
DEFAULT JUDGMENT AGAINST  
DEFENDANT KUNAL BANSAL

NOTE ON MOTION CALENDAR:  
February 17, 2023

I, Steven Guris, declare and state as follows:

1. I am the Director of Threat Investigations at Unit 221B, a private cybersecurity contracting firm. I am over 18 years of age. This Declaration is based upon personal knowledge and, if called as a witness, I could and would testify competently to the information provided herein.

2. As a result of my experience at Unit 221B investigating and working with cheats in the video game industry – including reverse engineering, code analysis, and malware analysis – and in particular with respect to Bungie's *Destiny 2* game, I am an expert in the field of video game cheats. Attached hereto as **Exhibit 1** is a true and correct copy of my resume.

3. I am also an active *Destiny 2* player, having logged more than 2,300 hours playing the game. This play time extends back to well before my professional association with Bungie.

4. Pursuant to the instructions of Unit 221B, Focal, PLLC (counsel for Plaintiff

1 Bungie in this action), and Bungie, I have investigated the *Destiny 2* cheats marketed, sold, and  
2 distributed by Defendant Kunal Bansal, aka “Lavi,” through his online store at, among other  
3 websites, the Lavicheats website <lavicheats.com> (the “Lavicheats Website”).

4 5. My investigation found that Bansal sold two distinct variants of cheats for  
5 *Destiny 2*, set at different price points presumably to appeal to varying tiers of customers.

6 6. The first cheat, sold by Bansal as the “Delta” cheat, was a sparsely-featured cheat  
7 also known as the “x22” cheat.

8 7. The second cheat, sold by Bansal as the “Premium” cheat, appeared to be a  
9 standard repackaging of the most common *Destiny 2* cheat believed to be developed by an  
10 operation known as “Ring-1” (the “Lavicheats Premium” or “Ring-1 Cheat”). It is my opinion  
11 that the Ring-1 Cheat is the most commonly sold *Destiny 2* cheat as, aside from their own first-  
12 party sales, the Ring-1 organization has been shown to rely on a network of resellers and  
13 distributors like Bansal.

14 8. Although Bansal does not appear to have been involved in the development of  
15 either version of the cheats for *Destiny 2* he sold, Bansal appears to have taken an active hand in  
16 advertising and marketing the cheats to increase his own sales via his Lavicheats Website and  
17 other websites believed to be owned and/or operated by Bansal.

18 9. Attached hereto as **Exhibit 2** is a true and correct screenshot of the Lavicheats  
19 Website that Unit 221B captured in the course of its investigation of Bansal’s cheat software for  
20 *Destiny 2* (the “Cheat Software”) sold through the website. The screenshot shows the number of  
21 times, as stated by Lavi (Bansal), the loaders for the two versions of the Cheat Software for  
22 *Destiny 2* (e.g., the Delta/x22 and Premium/Ring-1 versions) were downloaded. Bansal (aka  
23 “Lavi”) made the posts showing the number of downloads of the Cheat Software.

24 10. The investigation conducted by me and the Unit 221B investigations team  
25 uncovered additional digital storefronts that appear to be owned and operated by Bansal  
26 specifically to sell *Destiny 2* cheats. These websites, <lavicheats.org> and <cobracheats.com>,  
27 were both promoted to Bansal’s customers via direct links present on the main Lavicheats

1 Website, <lavicheats.com>.

2 11. On September 13, 2021, Unit 221B purchased a copy of the *Destiny 2*  
3 Premium/Ring-1 cheat through Bansal's <lavicheats.com> storefront. In the checkout process for  
4 this transaction, a new button was observed offering an "alternative link" for payment. The link  
5 directed us to <lavicheats.org> to finish processing the transaction, but with an expanded list of  
6 payment processors, including Google Pay, as opposed to the main <lavicheats.com> domain.

7 12. Such a practice is common in my experience investigating cheat developers and  
8 sellers, as large payment processors such as PayPal, Stripe, or Google Pay frequently deny or  
9 suspend services for video game cheat storefronts as such transactions are generally in violation  
10 of the payment processor's terms of service. As customers are more familiar and comfortable  
11 with large payment processors, sellers are often seen registering new accounts or finding other  
12 methods of receiving payments through these familiar processors. Registration of new domains  
13 is a common, albeit temporary, solution to this problem facing game cheats sellers.

14 13. It is my opinion that <lavicheats.org>, sharing an identical domain name to  
15 <lavicheats.com> and linked directly from <lavicheats.com> during the purchase of a cheat for  
16 *Destiny 2*, is a secondary domain operated by Bansal to allow for Google Pay purchases for his  
17 cheats.

18 14. Following the initial filing of Bungie's lawsuit against Bansal, Unit 221B  
19 observed that all *Destiny 2* products were removed from the <lavicheats.com> digital storefront.  
20 The product pages for *Destiny 2* cheats were replaced by a message from Lavicheats (and  
21 therefore likely Bansal), explaining that in the wake of the lawsuit Lavicheats would no longer  
22 sell *Destiny 2* cheats. Attached hereto as **Exhibit 3** is a true and correct screenshot of the  
23 message on the Lavicheats Website that was captured in the course of Unit 221B's investigation.  
24 This message recommends prospective cheat customers for *Destiny 2* purchase the cheats  
25 through <cobracheats.com>, with a direct link to their *Destiny 2* premium cheat.

26 15. The domain <cobracheats.com> appears to have first been registered on  
27 September 6, 2021, shortly after Bungie filed this lawsuit against Bansal. At the time of our

1 investigation, <cobracheats.com> sold only a *Destiny 2* “Premium” and “Pro” cheat, at the exact  
2 price points and subscription durations of the Lavicheats Website’s “Premium” and “Delta”  
3 cheats, respectively. Advertisements for other game cheats on <cobracheats.com> were  
4 determined to be non-functional placeholders.

5 16. The <cobracheats.com> digital storefront featured promotional videos previously  
6 associated with the Lavicheats Website. The provenance of these videos may be clearly  
7 determined due to “Lavicheats” branding on each video. An example of this identical video on  
8 both <lavicheats.com> and <cobracheats.com> may be seen in **Exhibit 4** hereto.

9 17. Unit 221B purchased copies of *Destiny 2* cheats from both <lavicheats.com> and  
10 <cobracheats.com> to ascertain similarities between the cheats offered on the two sites. Aside  
11 from cosmetic differences in the digital storefronts through which they were purchased, the  
12 cheats sold by <cobracheats.com> and <lavicheats.com> are identical. Cheat files are  
13 downloaded by the customer from a Discord CDN (content delivery network), identical between  
14 both <cobracheats.com> and <lavicheats.com>, in a zip archive. The loader installed from this  
15 archive is identical, regardless of whether it was purchased from <lavicheats.com> or  
16 <cobracheats.com>.

17 18. Multiple other indicators of links between <cobracheats.com> and  
18 <lavicheats.com>, including common payment processors and checkout options, shared support  
19 staff via Discord, and common branding across both sites, may be established. In my opinion it is  
20 almost certain that <cobracheats.com> was directly owned and operated by Bansal in order to  
21 continue selling *Destiny 2* cheats despite legal proceedings against him.

22 19. Further, in my opinion such an action on the part of Bansal is highly probable. On  
23 November 22, 2021, Unit 221B was requested, on behalf of Bungie’s counsel Focal PLLC, to  
24 serve the Complaint in this action on Bansal. Unit 221B accomplished this service via forum post  
25 on the Lavicheats Website forums. This post was made by the Gmail account  
26 “michaelstaby@gmail.com,” an account created and owned by Unit 221B. The post providing  
27 notice of this lawsuit was soon manually deleted from the Lavicheats Website, an action

1 indicative of human intervention. Further, before this message was deleted, we were emailed a  
2 notification that a response had been posted in reply. When the post containing Unit 221B's  
3 notice of this action was deleted, this reply was deleted as well.

4 20. The reply to Unit 221B's forum post notifying Bansal of this lawsuit was made  
5 from the Lavicheats forum account "Lavi," an alias for the site's administrator and owner,  
6 Bansal. The reply posted by Lavi simply reads, "Bungie lawyers you can suck my nuts!"  
7 Attached hereto as **Exhibit 5** is a true and correct copy of the email notification Unit 221B  
8 received when the reply by Lavi (Bansal) was posted on the Lavicheats Website forum.

9 21. Given the manner of Bansal's reply to notice of this lawsuit, it is my opinion that  
10 creating a new website (<cobraceats.com>) to sell *Destiny 2* cheats despite ongoing legal action  
11 against him is consistent with his reply.

#### 12 **Video Game Cheat Software and Anti-Cheat Measures**

13 22. Video game developers and publishers like Bungie devote significant time and  
14 resources to preventing and detecting cheating in their games, including by so-called anti-cheat  
15 technical measures. These anti-cheat technical measures are designed to detect the system  
16 processes of cheat software and take automated actions against offending players.

17 23. As a result of these anti-cheat measures, a core component of cheat software is  
18 obfuscation and circumvention mechanisms designed to allow the cheater to remain undetected  
19 by anti-cheat and other security measures. The Cheat Software for Bungie's *Destiny 2* marketed,  
20 sold, and distributed by Bansal necessarily employ such mechanisms in an attempt to avoid  
21 detection by Bungie's anti-cheat technical measures.

22 24. In a modern massively multiplayer online game such as *Destiny 2*, the instance of  
23 the game running on a player's PC using Microsoft's Windows operating system is referred to as  
24 the player's game client. The game client can be thought of as an extension of the game servers  
25 owned and maintained by, as relevant here, Bungie, and permits the user to play the game on  
26 their device.

27 25. In order to effectively render the environment of the game world and

1 communicate virtually instantaneously with remote game servers maintained by the company,  
2 the player's game client must store key variables on the player's device. These variables may  
3 include data on the player's character, the positions, health, and headings of other players'  
4 characters, and data related to objects within the game environment. These variables are  
5 contained in the player's device's memory while the game client is running, in other words,  
6 while the game software is actively running. These variables are frequently referred to as "game  
7 state" data.

8         26. As is true for all executing programs in a computer's memory, the memory spaces  
9 used by Bungie's *Destiny 2* are considered privileged spaces; in other words, only *Destiny 2*  
10 should be able to access those spaces while in use, including to read game data, and the normal  
11 operation of Windows is intended to categorically prevent other applications from interfering  
12 with the protective measures Bungie puts in place to prevent exposure and manipulation of  
13 *Destiny 2* game data.

14         27. Therefore, in order to deliver the promised functionality of game cheats, including  
15 those sold by Bansal for Bungie's *Destiny 2*, such cheats must infiltrate these privileged memory  
16 spaces to read and/or manipulate the protected data from the *Destiny 2* process.

17         28. While I have not directly reverse engineered or technically analyzed either the  
18 Delta/x22 cheat or the Premium/Ring-1 Cheat sold by Bansal, I have conducted a cursory  
19 examination of the behavior of these cheats on a user's device, as well as reviewed their  
20 installation instructions. From this data and the similarity of the cheats to others I have examined  
21 in the course of my work, however, in my opinion several assumptions may be made regarding  
22 both cheat's circumvention of Bungie's anti-cheat measures.

23         29. Both cheats require installation on a user's device "as an administrator," a state of  
24 elevated privileges generally reserved for those tasked with the maintenance of a device. For a  
25 personal computer, this is generally the owner of the computer itself. Device administrators,  
26 which may also be known as "admin" or "root" users, have unrestricted access to the entire  
27 operating system of a device. They may add or remove other users at will, create or suspend

1 services used on the device, and, crucially, have unrestricted access to disable any security  
2 features such as firewalls, anti-virus protections, or automated drive backups.

3 30. Installing any program “as an administrator” extends these same rights to the  
4 program. Once installed with these privileges, the program will retain them every time it is used  
5 on a user’s device.

6 31. For game cheats seeking to circumvent anti-cheat software or other technical  
7 protections, this access is vital. A common vector for this circumvention, which appears to be  
8 used by the Cheat Software for *Destiny 2* sold by Bansal through the Lavicheats Website and its  
9 associated sites, is to begin running the cheat at the boot of the computer. As the device is  
10 turning on, or booting, the cheat may inject itself into core system processes to lend itself the  
11 appearance of a legitimate program. The target process for injection varies from cheat to cheat,  
12 but generally processes relied upon by the Windows operating system are chosen to leverage the  
13 native trust of these processes by other software. Frequently, the cheat software adopts the name  
14 and appearance of the targeted process as an additional attempt to evade detection. The targeted  
15 process is generally ubiquitous on Windows machines such as Notepad, or deprecated and  
16 insecure processes such as Internet Explorer.

17 32. With this level of privilege and trust, the cheat may then take a variety of actions  
18 in response to security scans, either by the user’s device or by anti-cheat measures. The cheat  
19 may abruptly cease functioning or attempt to stop or suspend such security scans to prevent its  
20 detection. As the cheat has administrator privilege, it may modify communications between the  
21 device and any remote server to remove any potentially revealing responses.

22 33. Commonly, cheats with this level of privilege also require users to deactivate or  
23 modify security software and settings on their local device to function. This may be seen in the  
24 disabling of protections such as Microsoft’s Windows Defender, or creating firewall exceptions  
25 to allow unfettered communication between the cheat software and its remote servers. These  
26 changes are applied whenever the user runs the cheat from their device and represent a critical  
27 security vulnerability to that device. Disabling security software implies that the user is now



1 unprotected from malware deployment, ransomware attacks, or other technical assault vectors.

2 **Bansal's Cheat Software for Bungie's *Destiny 2***

3 34. The core functionalities or features of cheats are typically similar within a  
4 particular genre of games. For example, Bungie's *Destiny 2* is a multiplayer, first-person shooter  
5 game that primarily takes place through the perspective of the player's character, with an  
6 emphasis on simulated combat using various ranged weapons including guns. As a result, the  
7 core features of a cheat for *Destiny 2* – including the Cheat Software offered by  
8 Bansal – commonly include “aimbot” and ESP (extra-sensory perception) or “wallhack”  
9 features. Both versions of the *Destiny 2* cheats sold by Bansal – the Delta/x22 and the  
10 Premium/Ring-1 cheats – include both of these features, which are described in more detail  
11 below.

12 35. **Aimbot.** Because first-person shooter gameplay like that in *Destiny 2* primarily  
13 involves simulated combat using guns and other ranged weapons, a player's ability to quickly  
14 and reliably aim their weapon is considered a crucial skill. The aimbot feature provides players  
15 using the cheat software with automated aim, enabling perfect accuracy on every shot. Players  
16 using a cheat with an aimbot are virtually guaranteed to win any competitive match against other  
17 players who are not exploiting the game by using a cheat. Modern cheats, such as the Cheat  
18 Software sold by Bansal for *Destiny 2*, generally offer users the ability to finely tune this aimbot  
19 in an attempt to avoid detection from either automated anti-cheat mechanisms intended to detect  
20 suspicious behavior or from in-game reports from other players. Attached hereto as **Exhibit 6** is  
21 a true and correct screenshot captured from the Lavicheats Website that described the *Destiny 2*  
22 aimbot feature in more detail, including advice to exercise “a little discretion” when using the  
23 feature to avoid being “caught and banned” by the game administrators.

24 36. **ESP or extra-sensory perception.** As competitive gameplay in a first-person  
25 shooter game like *Destiny 2* typically takes place within a varied and detailed map including  
26 obscuring obstacles, a player's awareness of their opponents and surroundings is a valuable skill.  
27 ESP or extra-sensory perception features (also sometimes referred to as a “wallhack”) allow



1 players to see the locations of their opponents, including other players and NPCs, through walls,  
 2 obstacles, and other sight-obscuring terrain within the game environment. This feature is  
 3 commonly displayed by creating graphical elements overlaid on a player's game client, normally  
 4 colored boxes, lines, or wireframes indicating the location of otherwise hidden enemies. ESP or  
 5 wallhack features allow cheat users to locate and begin attacking opponents before the opponent  
 6 is aware the cheat user is attacking by providing more information to the cheat user than is  
 7 available through normal *Destiny 2* gameplay. Attached hereto as **Exhibit 7** is a true and correct  
 8 screenshot captured from the Lavicheats Website that described the *Destiny 2* ESP feature in  
 9 more detail.

10 37. The Delta/x22 cheat sold by Bansal used a directional line in combination with a  
 11 wireframe model of the target as the primary graphical element of its ESP offering. Attached  
 12 hereto as **Exhibit 8** is a true and correct screenshot of gameplay of *Destiny 2* while using the  
 13 Delta/x22 cheat. In this image, the cheater's target is intended to be obscured from view, as they  
 14 are behind boxes, walls, and multiple obstacles. However, the use of the cheat's ESP features  
 15 allows the cheater to track their victim despite the presence of obstructing obstacles.

16 38. The Premium/Ring-1 cheat sold by Bansal used a colored box as the primary  
 17 graphical element of its ESP offering. Attached hereto as **Exhibit 9** is a true and correct  
 18 screenshot of gameplay of *Destiny 2* while using the Premium/Ring-1 cheat, showing an example  
 19 of the colored box (in the top center of the image). While the cheater's victim is directly in view,  
 20 the colored box around the victim is a graphical element that is not present in Bungie's  
 21 *Destiny 2*. This marker is added to the display by the cheat to allow cheaters to track their targets  
 22 no matter their location.

23 39. In addition to these basic features, the Premium or Ring-1 Cheat for *Destiny 2*  
 24 sold by Bansal offered significantly expanded functionalities over the Delta/x22 cheat. For  
 25 example, in addition to the aimbot and ESP features, the Premium *Destiny 2* cheat offered  
 26 features such as OPK or one-position kill; player state manipulations such as instant respawns  
 27 following a defeat or instant recharge times for cheater abilities; "noclip," "speedhacks," or

“flyhacks”; and player weapon manipulation, including rate of fire alteration up to fully automatic fire for all weapons, infinite ammunition for all weapons, or elimination of weapon recoil. These additional features are described in more detail below.

40. **OPK or one-position kill.** OPK features allow cheat users to remove even the possibility of their victim fighting back by manipulating game state data to effectively teleport an enemy character directly in front of the cheat user. This teleportation process will repeat potentially hundreds of times in quick succession, allowing a cheat user ample time to secure their kill. From the victim’s perspective, nothing appears amiss until they begin taking damage and their character is defeated with no opponents in sight. This feature may also be referred to as “teleport to crosshair,” and it automatically teleports players to a position advantageous to the cheat user, an ability that is not permitted in the normal operation of *Destiny 2*.

41. Like the ESP feature, the OPK feature of the Cheat Software could only function in *Destiny 2* if the cheat developers copied *Destiny 2* software code that corresponds to the data structures for player and combat positioning. The developers would then have to incorporate the copied or reverse-engineered *Destiny 2* code into every copy of the cheat software sold or distributed. Further, for this code to work as advertised by calling necessary functions and manipulating character positions, the cheat software must inject code into the authentic copy of *Destiny 2* on the cheat user’s computer. This injected code then must modify the player data input structures and call functions in *Destiny 2*’s code to teleport other players.

42. **Player state manipulations.** The Premium or Ring-1 Cheat for *Destiny 2* sold by Bansal also offered a variety of features that can be generally characterized as functions allowing the cheat user to manipulate the game state data about their in-game character that otherwise would not be possible in normal *Destiny 2* gameplay.

43. *Destiny 2* offers a variety of competitive player-vs-player or PvP gameplay modes with different scoring models for victory. However, regardless of the modes, defeating enemies comprises a core gameplay mechanic – defeated enemies cannot score points and the opposing team has a numerical advantage while the defeated player is “down.” In the vast majority of

gameplay modes, defeated players are returned to the match after a brief window of time. The return of the defeated player is referred to as a “respawn” and the window of time they remain defeated is referred to as the “respawn timer.” *Destiny 2* commonly sets the respawn timer at five, fifteen, or thirty seconds, although some activities force an indefinite timer and require action on the part of an undefeated (or “alive”) player to return the defeated player to the match. Respawned players are generally returned to the match in a “safe” location away from enemy players. The Premium/Ring-1 Cheat sold by Bansal offers an “instant respawn” feature, allowing cheat users to return to the match instantly following a defeat. Crucially, I observed this feature returning defeated cheat users to the match in the exact position in which they were defeated. This effectively renders the cheat user immortal, the cheat user’s victims receive no benefit for the defeat of the cheater’s character and typically will be defeated immediately by the cheat user upon their instant respawn.

44. *Destiny 2* provides players with a variety of abilities associated with their characters. These abilities include thrown grenades, empowered melee attacks, or what is referred to as a “Super” in the parlance of the game. “Supers” may be considered the most powerful of a player’s ability, and frequently have the ability to either prevent player death or defeat large numbers of enemies immediately. To balance gameplay, all of these abilities are given “cooldown” timers. These timers begin after an ability is used and can range from a few seconds to minutes. Due to their effectiveness, cooldowns on “Super” abilities are much longer than other abilities; the shortest cooldown timers on “Super” abilities are generally more than six minutes. The Premium/Ring-1 Cheat for *Destiny 2* sold by Bansal offers instant cooldowns for all of these player abilities, including “Supers.” Thus, players using cheats with this feature can unleash a destructive “Super” ability against their victims at will.

45. “Noclip,” “speedhacks,” and “flyhacks.” The Premium/Ring-1 Cheat sold by Bansal also offers various features that allow a cheat user to manipulate the speed and movement of their character in *Destiny 2*.

46. To aid in the realism of gameplay, *Destiny 2* players are generally prevented from

1 passing through solid objects in the game environment such as walls, barricades, or debris. The  
 2 movement of a player's character to a position inside one of these solid objects is referred to as  
 3 "clipping," and is generally viewed as a bug within the game. However, a "noclip" feature allows  
 4 a cheat user to pass through these solid objects as if they did not exist, bestowing a massive  
 5 advantage to the cheat user in the simulated firefights of *Destiny 2* competitive play.

6 47. "Speedhacks" allow a cheat user to illegitimately manipulate the in-game speed of  
 7 their character, permitting them to move much faster than intended. This extra speed enables  
 8 easier dodging of enemy weapon's fire, or the ability to quickly change positions to defeat an  
 9 opponent. An extension of the speedhack, the "flyhack," allows the cheat user to leave the  
 10 ground entirely and move through open space as if they were flying.

11 48. To conceptualize the unfair advantage the noclip, speedhack, and flyhack features  
 12 of the Premium/Ring-1 Cheat for *Destiny 2* give to cheat users, consider the following example.  
 13 A cheat user and their victim are engaged in a firefight. In the exchange of fire, the victim uses a  
 14 wall or box as "cover," allowing them a point of safety from which to engage their opponent. In  
 15 normal play, this cover is unassailable; bullets and abilities will not pass through, and a player  
 16 obscured by cover should not take damage from incoming fire. The cheat user sees their victim  
 17 using this cover and decides to employ the features described above. Using the speedhack or the  
 18 flyhack, the cheater leaves the ground and rapidly closes the distance to their victim. Using  
 19 noclip, they pass through the solid object the victim was using for cover and appear behind the  
 20 victim, allowing them to defeat their victim with trivial effort.

21 49. **Player weapon manipulations.** *Destiny 2* offers players an incredibly varied  
 22 array of potential weapons; at the time of this Declaration, there are currently more than 1,100  
 23 different weapons within the game. These weapons are divided into different families or  
 24 archetypes and have a vast number of customization options and functionalities. As with real-  
 25 world firearms, the weapons of *Destiny 2* feature different rates of fire, magazine sizes, and  
 26 recoil characteristics. Player choices of weapons within *Destiny 2* often center around these  
 27 characteristics, and knowledge of the proper use of each is considered a key gameplay skill. The

1 Premium/Ring-1 Cheat sold by Bansal features multiple options to allow cheat users to  
2 manipulate game state data about their in-game weapons as well as the capabilities of those  
3 weapons.

4 50. Weapons within *Destiny 2* are frequently divided into categories by type and rate  
5 of fire. Some weapons are designed by Bungie as semi-automatic weapons, where each shot  
6 requires an additional mouse click or other input from the player simulating the action of pulling  
7 the trigger. Other weapons are designed to be fully automatic weapons, where a player may  
8 shoot rapidly by holding the trigger down, simulated by the user holding a mouse click. This  
9 distinction frequently is a key defining measure for each weapon family within *Destiny 2*, and a  
10 player's skill with these different types of fire is intended to be honed over long periods of  
11 gameplay. However, the Premium/Ring-1 Cheat sold by Bansal allows cheat users to manipulate  
12 these characteristics at will. This gives cheaters a distinct advantage against opponents, as a  
13 weapon's ability to defeat an opponent is frequently balanced around rate of fire.

14 51. Weapons in *Destiny 2* also feature different recoil patterns, which adjust a  
15 player's aim to simulate the movement of a fired weapon. Compensating for this recoil and  
16 continuing to score hits against an opponent is a core skill developed by players over time. The  
17 Premium/Ring-1 Cheat sold by Bansal offers options to reduce or entirely remove this recoil  
18 effect, giving the cheater an even greater degree of accuracy in weapon fire.

19 52. Ranged weapons in *Destiny 2* each feature a magazine of ammunition which,  
20 when expended, requires a player to reload or switch to another weapon. During that time, the  
21 player is more vulnerable as they are unable to return fire while reloading or switching weapons.  
22 Further, certain weapons in *Destiny 2* that are able to rapidly defeat another player with a single  
23 attack, such as shotguns, sniper rifles, rocket or grenade launchers, and other more exotic  
24 weapons, are intentionally restricted to limited amounts of ammunition during competitive  
25 gameplay to create a level playing field. The Premium/Ring-1 Cheat sold by Bansal has a feature  
26 that allows cheat users to remove this restriction built into the game by Bungie, both as to total  
27 available ammunition and the amount of ammunition stored in a weapon's magazine. Cheaters

1 are thus given a distinct advantage by having guaranteed access to more powerful weapons than  
2 legitimate players.

3 53. As an example, in *Destiny 2*, a rocket launcher is a very effective weapon in  
4 competitive gameplay as the speed of the rocket and the large blast it creates and the damage it  
5 causes may defeat multiple opponents with a single shot. Therefore, to balance gameplay, such a  
6 weapon receives ammunition on a highly limited basis, and acquisition of this ammunition may  
7 be a key gameplay objective in a competitive match. Rocket launchers are generally given a  
8 single piece of ammunition at a time and if more ammunition is acquired, they feature a  
9 significant reload time during which the user is vulnerable to opponents. The Premium/Ring-1  
10 Cheat sold by Bansal allows cheat users to fire an unending deluge of these rockets without  
11 pause or reloading, providing a distinct and insurmountable advantage against legitimate players.

12 54. The Delta/x22 cheat sold by Bansal through Lavicheats and its associated  
13 websites offered aimbot and ESP features to customers. An image of the Delta/x22 menu listing  
14 these aimbot features and settings may be seen in **Exhibit 10** attached hereto, which consists of  
15 an image captured while playing *Destiny 2* using the cheat that shows the Cheat Software's in-  
16 game menu. An image of the Delta/x22 menu listing ESP features and settings may be seen in  
17 **Exhibit 11** attached hereto, which also consists of an image captured while playing *Destiny 2*  
18 using the cheat that shows the Cheat Software's in-game menu.

19 55. The Premium/Ring-1 Cheat sold by Bansal also offered aimbot and ESP features.  
20 Those features can be seen in **Exhibit 12** attached hereto, which consists of an image captured  
21 while playing *Destiny 2* using the cheat that shows the Cheat Software's in-game menu. The  
22 Premium/Ring-1 Cheat also offered a variety of additional features including OPK, player state  
23 manipulations such as flyhacks, speedhacks, and noclip, and weapon state manipulations such as  
24 removal of recoil, infinite ammunition, or rate of fire manipulation. These additional features  
25 may be seen in **Exhibit 13** and **Exhibit 14** attached hereto, which also consist of images  
26 captured while playing *Destiny 2* using the cheat that shows the Cheat Software's in-game menu.

27 56. For all of the features for the *Destiny 2* Cheat Software sold by Bansal described

1 above, it is my opinion, based on my background and experience, that these features may only  
 2 operate by reading and manipulating data from *Destiny 2*'s privileged memory space on a  
 3 player's device.

4 57. Additionally, each of the cheat features discussed above allows cheaters to gain  
 5 an unfair competitive advantage against legitimate players of *Destiny 2*. Those advantages are  
 6 well beyond the scope of a player's abilities within normal gameplay as designed by Bungie. The  
 7 presence of such cheaters in a competitive game environment is destructive to the continued  
 8 health of the game, as well as its community and developers. When legitimate players frequently  
 9 encounter cheaters, the resulting negative reaction is normally directed at the developers of the  
 10 game. These interactions can disincentivize developers from interacting with the community,  
 11 which can create a larger negative reaction from the legitimate player base. This can become a  
 12 vicious cycle wherein the community does not trust that the developers will protect a balanced  
 13 and fun game experience, eventually driving these players to other games.

14 58. In online, live-service games like *Destiny 2*, positive interactions between the  
 15 game developer and its community are of great importance to the continued success of the game.  
 16 This is particularly due to the influence of third-party content creators in the game's community.  
 17 These content creators, who generally stream live gameplay through sites such as Twitch or post  
 18 recorded videos to YouTube, may have hundreds of thousands of followers.

#### 19 **Unit 221B's Fees**

20 59. Investigating the Cheat Software for *Destiny 2* sold by Bansal through his digital  
 21 storefronts demanded substantial investments of time and resources. Myself and my team have  
 22 spent a collective 146 hours investigating his Cheat Software since the beginning of our  
 23 engagement with Focal and Bungie.

24 60. Bungie has paid Unit 221B \$55,006 in connection with our investigation and  
 25 analysis of Bansal's Cheat Software for *Destiny 2*, billed at Unit 221B's customary rates and  
 26 pursuant to the agreement with Bungie's counsel in this action, Focal PLLC.

27 I declare under penalty of perjury under the laws of the United States that the foregoing is



1 true and correct to the best of my knowledge.

2 Executed this 17th day of February, 2023, at Marietta, Georgia.

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5 STEVEN GURIS  
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